

1 **IN THE UNITED STATES DISTRICT COURT**
2 **FOR THE DISTRICT OF ARIZONA**

3 IN RE BARD IVC FILTERS
4 PRODUCTS LIABILITY LITIGATION

No. 2:15-MD-02641 -DGC

5 This Document Relates to:

6 Valencia Allen
7 Civil Action No.: 2:16-cv-00340-DGC

8 **MOTION FOR SUBSTITUTION OF COUNSEL**

9 Counsel moves this Court for an Order substituting Ramon R. Lopez of Lopez
10 McHugh LLP for Troy A. Brenes of Brenes Law Group, P.C.

11 1. Plaintiff, Valencia Allen, requests that she be represented by Ramon R. Lopez of
12 Lopez McHugh, LLP (See the Consent Order Granting Substitution of Attorney, attached
13 hereto as Exhibit A).

14 2. Troy A. Brenes of Brenes Law Group, P.C. consents to this substitution (See
15 Consent Order Granting Substitution of Attorney, attached hereto as Exhibit A).

16 3. Based on the foregoing, Valencia Allen requests that this Court grant her request
17 for substitution of Ramon R. Lopez of Lopez McHugh LLP in this action.

18 Date: June 12, 2018

Respectfully submitted,

19 **LOPEZ McHUGH LLP**

20 By /s/Ramon R. Lopez
21 Ramon Rossi Lopez (CA Bar No. 86361)
22 (admitted pro hac vice)
 100 Bayview Circle, Suite 5600

MOTION FOR SUBSTITUTION OF COUNSEL

Newport Beach, California 92660

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of June, 2018, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/Matthew R. Lopez